PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Global Glass, Inc.
28967 US 33 West
Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7574-00392	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass and plastic parts manufacturing s source.

Responsible Official:	Gary Beck
Source Address:	28967 US 33 West, Elkhart, Indiana 46516
Mailing Address:	28967 US 33 West, Elkhart, Indiana 46516
SIC Code:	3089
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This fiberglass and plastic parts manufacturing company consists of four (4) plants:

(a) Plant 1 is located at 28967 U.S. 33 West, Elkhart, Indiana;

(b) Plant 2 is located at 28967 U.S. 33 West, Elkhart, Indiana;

(c) Plant 3 is located at 56807 Elk Park Drive, Elkhart, Indiana; and

(d) Plant 4 is located at 58190 County Road 3, Elkhart, Indiana.

Since the four (4) plants are located on adjacent properties, have similar SIC codes, have support relationships, and are owned by one company, they will be considered as one (1) source. This determination was made previously in CP 039-9601-00493, issued on August 31, 1998, and has been reviewed in May 2001 at the request of the applicant.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plants 1 and 2 - US 33 West

(a) One (1) metton injection area, known as MIJB1, constructed in 1994, equipped with four (4) metton injection presses, each with a maximum capacity of 50 parts per hour, emissions are uncontrolled and exhausting to stack SV004.

(b) One (1) metton painting area, consisting of one (1) paint booth, known as MPB, constructed in 1994, and later updated to meet OSHA requirements, with one (1) paint mixing area. The paint booth is equipped with HVLP spray equipment, with a maximum capacity of 200 parts per hour, using dry filters as control equipment, and exhausting to stack SV005.

(c) One (1) metton post final/final finish area, known as MFF, constructed in 1994, equipped with HVLP spray equipment, with a maximum capacity 200 parts per hour, equipped with dry filters for air pollution control, and exhausting to stack SV007.

(d) One (1) metton grinding area, known as MGB, constructed in 1994, with a maximum capacity 200 parts per hour, equipped with dry filters and a water wash system as control equipment, and exhausting inside the building.

Plant 3 - Elk Park Drive

(e) One (1) gel coat booth, known as Booth B, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV001.

(f) One (1) lamination booth, known as Booth A, constructed in 1996, with a maximum capacity 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV002.

(g) One (1) grinding booth, known as Booth C, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, equipped with a water wash system as control equipment.

Plant 4 - County Road 3

(h) One (1) custom gel coat booth, identified as SV001, constructed in 1998, equipped air assisted airless spray equipment and dry filters for overspray control, capacity: 19 fiberglass parts per hour.

(i) One (1) custom lamination booth, identified as SV002, constructed in 1998, equipped with flowchop gun systems and dry filters for overspray control, capacity: 19 fiberglass parts per hour.

(j) One (1) grinding booth, identified as SV003, constructed in 1998, equipped with an air wall dust collection system exhausting inside the building for air pollution control, capacity: 2,179 pounds per hour.

(k) One (1) gel coat reciprocator flat panel facility, identified as SV004, constructed in 1998, equipped with one (1) air- assisted spray gun and dry filters for overspray control, capacity: 5 flat panels per hour.

(l) One (1) resin reciprocator flat panel facility, identified as SV005, constructed in 1998, equipped with one (1) flowchop gun and dry filters for overspray control, capacity: 5 flat panels per hour.

(m) One (1) 52" wide belt sander for the flat panel operation, constructed in 1998, equipped with a 3-bag dust collection system for particulate control exhausting inside the building, maximum capacity: 250 pounds per hour.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Metal inert gas and oxyacetylene flame cutting operations at various locations in the four plants, with emissions less than 5 pounds per day or 1 ton per year of a single HAP, less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, and less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(b) One (1) woodworking area equipped with a two bag dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(c) One (1) panel cutter located at Plant 4, equipped with a drum collection system and no direct exhaust, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(d) One (1) CNC wood cutting and one (1) CNC metal cutting machine, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely

if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Officer (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Northern Regional Office
Telephone Number: 219-881-6712
Facsimile Number: 219-881-6745

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement

until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM,

OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. sThe notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68,

including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit

and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Fiberglass and Surface Coating Operations

Plants 1 and 2 - US 33 West

(a) One (1) metton injection area, known as MIJB1, constructed in 1994, equipped with four (4) metton injection presses, each with a maximum capacity of 50 parts per hour, emissions are uncontrolled and exhausting to stack SV004.

(b) One (1) metton painting area, consisting of one (1) paint booth, known as MPB, constructed in 1994, and later updated to meet OSHA requirements, with one (1) paint mixing area. The paint booth is equipped with HVLP spray equipment, with a maximum capacity of 200 parts per hour, using dry filters as control equipment, and exhausting to stack SV005.

(c) One (1) metton post final/final finish area, known as MFF, constructed in 1994, equipped with HVLP spray equipment, with a maximum capacity 200 parts per hour, equipped with dry filters for air pollution control, and exhausting to stack SV007.

Plant 3 - Elk Park Drive

(e) One (1) gel coat booth, known as Booth B, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV001.

(f) One (1) lamination booth, known as Booth A, constructed in 1996, with a maximum capacity 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV002.

Plant 4 - County Road 3

(h) One (1) custom gel coat booth, identified as SV001, constructed in 1998, equipped air assisted airless spray equipment and dry filters for overspray control, capacity: 19 fiberglass parts per hour.

(i) One (1) custom lamination booth, identified as SV002, constructed in 1998, equipped with flowchop gun systems and dry filters for overspray control, capacity: 19 fiberglass parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 039-9601-00493, issued on August 31, 1998, all operations, including the use of resins, gel coats, coatings, dilution solvents, and cleaning solvents at Plants 1, 2, 3 and 4, (with the exception of the flat panel facility at Plant 4), shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than 250 tons per 12 consecutive month period. These facilities represent the “existing source” prior to the minor source modification also contained in CP 039-9601-00493.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with this limit also partially satisfies the requirements of 326 IAC 8-1-6 (BACT) for the Plant 3 gel coat booth (A), Plant 3 lamination booth (B), the Plant 4 custom gel coat booth (SV001) and the Plant 4 custom lamination booth (SV002).

Compliance with this limit shall be determined based upon the following criteria:

(a) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

(b) The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for injection molding shall be 1.0% of the input volatile organic compounds. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The Best Available Control Technology (BACT) conditions from CP 039-3322-00208, issued on August 24, 1994, and CP 039-6426-00392, issued on August 20, 1996, are no longer applicable. These conditions, requiring certain workplace practices and monthly limitations on VOC emissions are based upon AP-42 emission factors for fiberglass reinforced plastics operations. IDEM, OAQ, has determined that the AP-42 emission factors for these processes are no longer valid, and that the BACT should be reevaluated with emissions calculated using the “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association, April 1999. The revised BACT condition follows as Condition D.1.3.

D.1.3 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to the determination of Best Available Control Technology for VOC emissions from resin and gel coat application operations at the Plant 3 gel coat booth (A), Plant 3 lamination booth (B), the Plant 4 custom gel coat (SV001) and the Plant 4 custom lamination booth (SV002), the Permittee shall comply with the following conditions:

(a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) VOCs for the entire source (Plants 1, 2, 3 and 4, with the exception of the flat panel facility) shall be less than 250 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, weight percent monomer that is VOC, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM OAQ: “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission

calculations, monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) As a surrogate to volatile organic compounds (VOC) limits, resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled ($35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI[a] standards	45
Production-Clear, subject to ANSI[a] standards	50

[a] American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.12 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$' Em_A \leq ' (M_R * E_a)$

Where:

M_R = Total monthly mass of material within each category
E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Cross averaging between resin categories has been approved by IDEM OAQ for Global Glass. In these instances, the HAP monomer content limits for resins and gel shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging across categories:

$' Em_A \leq ' (M_R * E_{Ra}) + ' (M_G * E_{Ga})$
Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

Em_A = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

(c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.
(2) Production, specialty product resins from all sources.
(3) Tooling resins used in the manufacture of watercraft.
(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term “inert filler” does not include pigments.

(d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.
(2) Air-assisted airless.
(3) Airless.
(4) High volume, low pressure (HVLP).
(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(e) The work practice, cleaning, and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.1.4 shall be followed.

D.1.4 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

(a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.
(B) All production and tooling gel coats that contain HAPs.
(C) Waste resins and gel coats that contain HAPs.
(D) Cleaning materials, including waste cleaning materials.
(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(6) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(A) Appropriate application techniques.
(B) Appropriate equipment cleaning procedures.
(C) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(7) The owner or operator shall maintain the following training records on site and available for inspection and review:

(A) A copy of the current training program.
(B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Pursuant to 326 IAC 20-25-3(d), on or after January 1, 2002 the following cleaning operations for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be

in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.
(2) Address of the physical location.
(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

D.1.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total combined VOC content delivered to the applicators of the Plant 1 and 2 metton painting booth, known as MPB, and metton post final/final finish area, known as MFF, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the metton painting booth (MPB) and metton post final/final finish area (MFF) in Plants 1 and 2, and the gel coat booths and lamination booths in Plants 3 and 4 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5 (13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emissions units and any control devices.

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation in D.1.1 and Compliance with the HAP monomer content and usage limitations in Condition D.1.3 shall be determined by one of the following:

(a) The manufacturer's certified product data sheet.

(b) The manufacturer's material safety data sheet.

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins

or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) An alternate method approved by IDEM, OAQ.

D.1.9 VOC Emissions

Compliance with Conditions D.1.1, D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.10 Particulate Matter (PM)

In order to comply with Condition D.1.6, the dry filters for PM control shall be in operation at all times when the spray booths, gel coat booths and lamination booths are in operation.

D.1.11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booths, gelcoat booths and lamination booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.3, and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Conditions D.1.1, D.1.3 and D.1.5.

(1) The amount, VOC content and volatile organic HAP content of each resin, gel coat and paint. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the monthly usage of each resin, gelcoat and paint;

(3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.

(4) The cleanup solvent usage for each month;

(5) The total VOC and volatile organic HAP usage for each month; and

(6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.4(b), the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.3, and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 4 Flat Panel Facility

Plant 4 - County Road 3

(k) One (1) gel coat reciprocator flat panel facility, identified as SV004, constructed in 1998, equipped with one (1) air- assisted spray gun and dry filters for overspray control, capacity: 5 flat panels per hour.

(l) One (1) resin reciprocator flat panel facility, identified as SV005, constructed in 1998, equipped with one (1) flowchop gun and dry filters for overspray control, capacity: 5 flat panels per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 039-9601-00493 issued on August 31, 1998, and the MACT determination under 326 IAC 2-4.1-1, operating conditions for the gel coat reciprocator flat panel facility, identified as SV004, and the resin reciprocator flat panel facility, identified as SV005, shall be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive months. Compliance with this limitation also makes the requirements 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques ~~used~~ for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM OAQ: “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled ($35% by weight)	38
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	42
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI[a] standards	45
Production-Clear, subject to ANSI[a] standards	50

[a] American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.2.9 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$' Em_A \leq ' (M_R * E_a)$

Where:

M_R = Total monthly mass of material within each category
E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

(c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.
(2) Production, specialty product resins from all sources.
(3) Tooling resins used in the manufacture of watercraft.
(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term “inert filler” does not include pigments.

(d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.
(2) Air-assisted airless.
(3) Airless.

(4) High volume, low pressure (HVLP).
(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(e) Cleaning operations for resin and gel coat application equipment shall meet the following:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(f) The work practice and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.2.2 shall be followed.

(g) The Permittee has demonstrated to the satisfaction of IDEM, OAQ that the following techniques inherent in the design of the flat panel manufacturing operation reduce emissions and can be considered equivalent to meeting the requirements of Conditions D.2.1 (c) and (d) listed above:

(1) Overhead mechanized spray reciprocator to apply all gel coats and resins, which minimizes overspray off the mold through proper placement of spray gun stops and spray gun pressure calibration according to guidelines published by IDEM, OAM. The spray gun type shall be high volume low pressure (HVLP) or the equivalent.

(2) Placement of wood panels and minimal period of roll-out immediately after the last resin application.

Hence, the use of the techniques listed above is hereby approved by IDEM, OAQ as alternatives to meeting the requirements of Conditions D.2.1 (c) and (d) provided the techniques are employed from the startup of operation. All other conditions stated in this permit remain in effect.

D.2.2 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

(a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.
(B) All production and tooling gel coats that contain HAPs.
(C) Waste resins and gel coats that contain HAPs.
(D) Cleaning materials, including waste cleaning materials.
(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(6) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(A) Appropriate application techniques.
(B) Appropriate equipment cleaning procedures.
(C) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(7) The owner or operator shall maintain the following training records on site and available for inspection and review:

(A) A copy of the current training program.
(B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.
(2) Address of the physical location.
(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the gel coat reciprocator flat panel facility, identified as SV004, and the resin reciprocator flat panel facility, identified as SV005, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and any control devices.

Compliance Determination Requirements

D.2.5 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content and usage limitations in Condition D.2.1 shall be determined by one of the following:

(1) The manufacturer's certified product data sheet.

(2) The manufacturer's material safety data sheet.

(3) Sampling and analysis, using any of the following test methods, as applicable:

(A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(4) An alternate method approved by IDEM, OAQ.

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.7 Particulate Matter (PM)

Pursuant to CP 039-9601-00493, issued on August 31, 1998, and in order to comply with Condition D.2.2, the dry filters for PM control shall be in operation at all times when the gel coat reciprocator flat panel facility, identified as SV004, and the resin reciprocator flat panel facility, identified as SV005, are in operation.

D.2.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat reciprocator and the resin reciprocator stacks while one or more of the facilities are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -- Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Condition D.2.1.

(1) The amount, VOC content and volatile organic HAP content of each resin and gelcoat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the monthly usage of each resin and gelcoat;

(3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.

(4) The cleanup solvent usage for each month;

(5) The total VOC and volatile organic HAP usage for each month; and

(6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

(b) To document compliance with Condition D.2.2(b), the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) To document compliance with Condition D.2.7 and D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Grinding

Plants 1 and 2 - US 33 West

(d) One (1) metton grinding area, known as MGB, constructed in 1994, with a maximum capacity 200 parts per hour, equipped with a water wash system as control equipment.

Plant 3 - Elk Park Drive

(g) One (1) grinding booth, known as Booth C, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, equipped with a water wash system as control equipment.

Plant 4 - County Road 3

(j) One (1) grinding booth, identified as SV003, constructed in 1998, equipped with an air wall dust collection system exhausting inside the building for air pollution control, capacity: 2,179 pounds per hour.

(m) One (1) 52" wide belt sander, one (1) table saw and one (1) radial arm saw for the flat panel operation, constructed in 1998, equipped with a 3-bag dust collection system for particulate control exhausting inside the building, maximum capacity: 250 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plants 1 and 2 metton grinding booth (MGB) shall not exceed 7.59 pounds per hour when operating at a process weight rate of 5,014 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plant 3 grinding booth (C) shall not exceed 2.17 pounds per hour when operating at a process weight rate of 777 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plants 4 grinding booth, identified as SV003, shall not exceed 4.34 pounds per hour when operating at a process weight rate of 2,179 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plants 4 belt sander shall not exceed 1.02 pounds per hour when operating at a process weight rate of 250 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.2 Particulate Matter (PM)

In order to comply with Condition D.3.1;

(a) The water wash system for PM control shall be in operation at all times when the Plants 1 and 2 metton grinding booth, known as MGB, is in operation.

(b) The water wash system for PM control shall be in operation at all times when the Plant 3 grinding booth (C) is in operation.

(c) The air wall dust collection system for PM control shall be in operation at all times when the Plant 4 grinding booth (SV003) is in operation.

(d) The 3-bag dust collection system for PM control shall be in operation at all times when the Plant 4 belt sander and saws are in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) Metal inert gas and oxyacetylene flame cutting operations at various locations in the four plants, with emissions less than 5 pounds per day or 1 ton per year of a single HAP, less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, and less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(b) One (1) woodworking area equipped with a two bag dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(c) One (1) panel cutter located at Plant 4, equipped with a drum collection system and no direct exhaust, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.

(d) One (1) CNC wood cutting and one (1) CNC metal cutting machine, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions welding and flame cutting operations will be limited to 0.674 pounds per hour when operating at a process weight rate 135 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and P = process weight rate in tons per hour.

$E = 4.10\ (0.068\ \text{tons/hr})^{0.67} = 0.674$ pounds per hour.

(b) The particulate matter (PM) emissions from the woodworking, panel cutting and metal cutting operations will be limited to 1.44 pounds per hour when operating at a process weight rate 420 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and P = process weight rate in tons per hour.

$E = 4.10\ (0.210\ \text{tons/hr})^{0.67} = 1.44$ pounds per hour.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5] [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

(c) Compliance with 326 IAC 8-3-5 (Cold cleaner degreaser operation and control) also satisfies the requirements of 326 IAC 8-3-2 (Cold cleaner operation).

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.3 Particulate Matter (PM)

In order to comply with Condition D.4.1, the dust collector for PM control shall be in operation at all times when the Plant 3 woodworking area is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Global Glass, Inc.
Source Address: 28967 US 33 West, Elkhart, Indiana 46516
Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7574-00392

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Global Glass, Inc.
Source Address: 28967 US 33 West, Elkhart, Indiana 46516
Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7574-00392

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Global Glass, Inc.
Source Address: 28967 US 33 West, Elkhart, Indiana 46516
Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7574-00392
Facility: Entire Source, Plants 1, 2, 3 and 4, excluding Flat Panel Manufacturing Operation at Plant 4
Parameter: Volatile Organic Compound emissions
Limit: Less than 250 tons per consecutive twelve (12) month period

Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for injection molding shall be 1.0% of the input volatile organic compounds. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

Note: This form satisfies the reporting requirements of both Condition D.1.1 (326 IAC 2-2) and Condition D.1.3 (326 IAC 8-1-6).

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Global Glass, Inc.
Source Address: 28967 US 33 West, Elkhart, Indiana 46516
Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7574-00392
Facility: Plants 1 and 2 Metton Painting Booth (MPB) and Metton Final Finish area(MFF)
Parameter: Total Volatile Organic Compounds from both booths, as delivered to the applicators
Limit: Less than 25 tons per consecutive twelve (12) month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Global Glass, Inc.
Source Address: 28967 US 33 West, Elkhart, Indiana 46516
Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7574-00392
Facility: Plant 4 Flat Panel Manufacturing Operation
Parameter: Volatile Organic HAP emissions
Limit: Less than 100 tons per consecutive twelve (12) month period

Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic HAP emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Global Glass, Inc.
Source Address: 28967 US 33 West, Elkhart, Indiana 46516
Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7574-00392

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: **Global Glass, Inc.**
Source Location: **28967 US 33 West, Elkhart, Indiana 46516**
County: **Elkhart**
SIC Code: **3089**
Operation Permit No.: **T 039-7574-00392**
Permit Reviewer: **Patrick T. Brennan**

On March 1, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Global Glass, Inc. had applied for a Part 70 Operating Permit to operate a recreational vehicle fiberglass component parts manufacturing source with dry filters and water wash systems for air pollution control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On April 12, 2001, Teri L Schenk, on behalf of Global Glass, Inc. submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

326 IAC 20-25, Emissions From Reinforced Plastics Composites Fabricating Emission Units, became effective on March 7, 2001. Two new permit conditions, D.1.4, and D.2.2, have been added to the permit to implement the 326 IAC 20-25 requirements. These conditions, which are discussed under the OAQ changes beginning on page 17 of this addendum, resulted in renumbering all subsequent conditions in Sections D.1 and D.2.

Comment 1:

Section A.2 Part 70 Source Definition

Currently the permit lists all four-plant locations as contiguous. This is incorrect. Plant 1 & 2 are located on contiguous property at the 28967 US 33 West Location. Plant 3 and Plant 4 were determined to be adjacent under the Indiana interpretation in August of 1998. This was at a time when the state of Indiana was looking at adjacent as anything under 20 miles, under common ownership, and the same major SIC codes. After conversations with IDEM inspectors, EPA representatives, and the small business administration, we would like the original determination reviewed for purposes of this Title V permit application. Plants 3 & 4 currently have fiberglass operations conducted in them. Plants 1 & 2 currently manufacture Metton Products only. Plants 1 & 2 do not support plants 3 & 4, although they are under common ownership. They share the same major SIC code because the products fall under plastic and rubber manufacturing. The manufacturing processes are very different. Since the original determination, IDEM has changed the way they look at adjacent and contiguous.

Response 1:

OAQ has reviewed the source definition based upon information submitted by the applicant, using the criteria of 326 IAC 2-7-1(22). The source consists of four plants at three separate locations. While OAQ agrees that the plants are not contiguous as stated in the draft Part 70 permit, the three locations are located in close proximity to one another (within 3.5 miles if driving, within one mile directly), and qualify as adjacent under 326 IAC 2-7-1(22). In addition, they are under common ownership and control, and are engaged in support relationships, with transfer of parts between them. Accordingly, OAQ has determined that the four plants shall continue to be considered as one source for air permitting purposes.

Section A.2 of the Part 70 permit has been revised as follows:

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This fiberglass and plastic parts manufacturing company consists of four (4) plants:

(a) Plant 1 is located at 28967 U.S. 33 West, Elkhart, Indiana;

(b) Plant 2 is located at 28967 U.S. 33 West, Elkhart, Indiana;

(c) Plant 3 is located at 56807 Elk Park Drive, Elkhart, Indiana; and

(d) Plant 4 is located at 58190 County Road 3, Elkhart, Indiana.

Since the four (4) plants are located on ~~contiguous~~ **adjacent** properties, have ~~the same~~ **similar** SIC codes, **have support relationships**, and are owned by one company, they will be considered as one (1) source. This determination was made previously in CP 039-9601-00493, issued on August 31, 1998, **and has been reviewed in May 2001 at the request of the applicant.**

Comment 2:

Section A.3 Emission Unit Summary

This section lists one metton painting booth constructed in 1994. We would like to clarify that this booth was updated to be in compliance with OSHA requirements. There is one paint booth and one mixing booth. The mixing booth contains the paints used in the spray application and serves as both a storage area and a paint kitchen. This doesn't change any of the emission calculations. Global Glass uses mass balance calculations for figuring actual emissions. This only serves as clarification for IDEM staff.

Response 2:

Item (b) of Section A.3 has been revised as follows:

(b) One (1) metton painting **area, consisting of one (1) paint** booth, known as MPB, constructed in 1994, **and later updated to meet OSHA requirements**, **with one (1) paint mixing area**. **The paint booth is** equipped with HVLP spray equipment, with a maximum capacity of 200 parts per hour, using dry filters as control equipment, and exhausting to stack SV005.

Comment 3:

The description of the grinding booth at the plant three locations is incorrect. The water wash system doesn't require the use of dry filters. The system is internal and there is no direct exhaust. The exhaust returns inside the shop. Grinding dust is picked up in the water and carried through the system like in a water fall. This type of water wash system doesn't require the use of dry filters. This could have been confused with the old equipment before it was updated.

Response 3:

Item (g) of Section A.3 has been revised as follows:

(g) One (1) grinding booth, known as Booth C, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, equipped with ~~dry filters and~~ a water wash system as control equipment. ~~and exhausting to stack SV003~~.

Comment 4:

The applicant submitted the following comments regarding insignificant activities:

Plant 3 also has a metal and wood CNC cutting machine. These are listed in the original Title V permit application, however do not appear to be listed in the equipment listing. Emissions from these operations are insignificant. Clarification is needed to verify that this equipment was incorporated in this permit.

In Plant 2 there is a mold repair and mold maintenance area for the metton molds. Emissions from this maintenance area would have been included in the mass balance calculations. Clarification is needed to verify that this process was incorporated into this permit. These operations were listed in the original Title V application.

Section A.4, Specifically Regulated Insignificant Activities, specifically lists the welding stations and flame cutting stations at the plant three (3) location. The original applications submitted listed welding equipment for all four plant locations. Additional information was submitted to MES during the application process showing the total amount of equipment located at the Plant 1 location. Global Glass requests clarification that the word "station" doesn't limit the use of welding equipment in other plant areas and that it includes all the welding and cutting equipment located on site. This change doesn't affect the status of the welding and cutting operations being considered Insignificant.

In item (c) of section A4, there is a woodworking area listed that states it is equipped with a baghouse dust collector. This is a two bag dust collection system that doesn't have an external exhaust. Therefore should not be subject to insignificant activities, rather exempted activities.

Response 4:

Insignificant activities that have no applicable state or federal rules are listed only in the Technical Support Document, not in the Part 70 permit. The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns

are documented and part of the record regarding this permit decision. Items (bb) through (gg) of the insignificant activities list have been revised and clarified as requested, and are listed in this TSD Addendum as follows:

(bb) Mold maintenance area emitting less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs.

(cc) Metal inert gas and oxyacetylene flame cutting operations at various locations in the four plants, with emissions less than 5 pounds per day or 1 ton per year of a single HAP, less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, and less than 5 pounds per hour or 25 pounds per day of particulate matter.

(dd) One (1) CNC wood cutting and one (1) CNC metal cutting machine, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

~~(cc) One (1) metal inert gas welding station, capacity 0.5 pounds of wire per hour.~~

~~(dd) One (1) oxyacetylene flame cutting station, capacity 0.05 inches cut per minute.~~

(ee) One (1) woodworking area equipped with a **two bag** ~~baghouse~~ dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.

(ff) Two (2) acetone solvent distillation systems, one (1) at Plant 3 and one (1) at Plant 4.

(gg) One (1) panel cutter located at Plant 4, equipped with a drum collection system and no direct exhaust, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.

Section A.4 of the proposed permit, Specifically Regulated Insignificant Activities, has been revised as follows:

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

~~(a) One (1) metal inert gas welding station, capacity 0.5 pounds of wire per hour. [326 IAC 6-3-2]~~

~~(b) One (1) oxyacetylene flame cutting station, capacity 0.05 inches cut per minute. [326 IAC 6-3-2]~~

(a) Metal inert gas and oxyacetylene flame cutting operations at various locations in the four plants, with emissions less than 5 pounds per day or 1 ton per year of a single HAP, less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, and less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(b) ~~(c)~~ One (1) woodworking area equipped with a **two bag** ~~baghouse~~ dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(c) One (1) panel cutter located at Plant 4, equipped with a drum collection system and no direct exhaust, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(d) One (1) CNC wood cutting and one (1) CNC metal cutting machine, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

(e) ~~(d)~~ Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

Comment 5:

Section B.11 Preventative Maintenance Plans:

This permit requires preventative maintenance plans for these emission units and control equipment. A breakdown in internal exhaust systems would not create a violation in control of emissions as these systems to do not exhaust to the outside environment. EPA guidance specifically requires PMP's for control equipment. Conversations with EPA representatives have confirmed that the intent of PMP's is not to control normal production activities. Global Glass believes that the Indiana Statutes do not give legal authority to require PMP's on process operations. Clarification on what constitutes control equipment under IDEM's definition is also requested.

Response 5:

Condition B.11 states that a preventative maintenance plan is required only for those emission units with specific requirements in Section D.

326 IAC 1-2-3 defines air pollution control equipment as equipment which is not, aside from air pollution control requirements, vital to production of the normal product of the source or to its normal operation. Equipment is vital if the source could not produce its normal product or operate without it.

In the specific case of Global Glass, the dry filters used to control particulate matter from painting and fiberglass operations are considered control devices by state definition. For grinding operations, the dry filters or water wash systems are considered control devices regardless of whether the effluent exhausts inside the building or into the atmosphere, because these devices are necessary to ensure compliance with 326 IAC 6-3-2. In addition, it is the position of OAQ that there is always the potential to emit into the atmosphere through doors and windows.

The flow chop guns in fiberglass operations are not considered control devices. However, if lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, then a Preventive Maintenance Plan will be required even if there is no control device. Therefore, the flow chop guns are subject to PMP because the use of these guns is required as part of the BACT and MACT determinations in Sections D.1.3 and D.2.1. The Unified Emission Factors from the Composites Fabricators Association, which are also a part of the BACT and MACT determinations, and which were used to compute PTE for the source, require non-atomized applicators, which in this application are the flow chop guns.

No change has been made to the permit.

Comment 6:

Section C.15 Compliance Monitoring Plans

This section requires a compliance monitoring plan. There is no authority in 326 IAC 2-7-5 or 2-7-6 for a CMP or for a compliance response plan which is a part of the CMP. These plans are not reasonably necessary to assure or demonstrate continuing compliance and are unduly burdensome and oppressive.

Response 6:

There is sufficient authority for requiring a Compliance Monitoring Plan, and as a part of such plan, a Compliance Response Plan. 326 IAC 2-7-5(1) requires that all Title V permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance, even where the applicable requirement does not require periodic testing or instrumental monitoring.

Furthermore, the Compliance Response Plan (CRP) is part of the overall Compliance Monitoring Plan (CMP). The CMP calls for two types of maintenance: preventive maintenance and corrective maintenance. The OAQ received many comments from the regulated community regarding the previous version of the CMP, which included preventive and corrective maintenance in the same document, the Preventive Maintenance Plan (PMP). These comments requested that the OAQ split the PMP into two plans: one for preventive maintenance and one for corrective maintenance. Therefore, the OAQ responded by splitting the preventive maintenance and the corrective maintenance into the PMP and CRP, respectively. The requirement that the permit contain operational requirements and limitations that assure compliance with all applicable requirements, coupled with the rule requirements for compliance monitoring, provides all the necessary authority for this permit requirement.

No change has been made to the permit.

Comment 7:

Section C. 19 General Reporting Requirements

The source is required to submit a quarterly deviation and compliance monitoring report. The state is already receiving annual compliance certifications, emergency deviation reports, quarterly emission reports and annual emission reports. The quarterly emission report asks if a deviation occurred in that time period. Another form has been separately attached for the same purpose. This seems duplicative and unduly burdensome.

Response 7:

Condition C.19 (General Reporting Requirements) has changed the Semi-Annual Compliance Monitoring Report to the Quarterly Deviation and Compliance Monitoring Report. In paragraph (d) IDEM has clarified that the report does need to be certified by the responsible official, which should

make it less burdensome. In addition, the reporting will coincide with the routine quarterly reporting of VOC and HAPs emissions. This change is also reflected in all the D sections and the reporting forms. EPA has also requested this change.

In Condition B.12 (Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to Condition B.12(b)(5). The emergency form is now for emergencies only, and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report.

Comment 8:

Section D. 1 Facility Description

This section should be modified to match A Section if comments on A section are modified and clarified for consistency.

Response 8:

The facility description in Section D.1 for Plants 1 and 2 has been revised as follows:

Facility Description [326 IAC 2-7-5(15)]: Fiberglass and Surface Coating Operations

Plants 1 and 2 - US 33 West

(a) One (1) metton injection area, known as MIJB1, constructed in 1994, equipped with four (4) metton injection presses, each with a maximum capacity of 50 parts per hour, emissions are uncontrolled and exhausting to stack SV004.

(b) One (1) metton painting **area, consisting of one (1) paint** booth, known as MPB, constructed in 1994, **and later updated to meet OSHA requirements**, **with one (1) paint mixing area**. **The paint booth is** equipped with HVLP spray equipment, with a maximum capacity of 200 parts per hour, using dry filters as control equipment, and exhausting to stack SV005.

(c) One (1) metton post final/final finish area, known as MFF, constructed in 1994, equipped with HVLP spray equipment, with a maximum capacity 200 parts per hour, equipped with dry filters for air pollution control, and exhausting to stack SV007.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 9:

Section D. 1.3 General Reduction Requirements

(b) The HAP monomer content of resins and gelcoats used shall be limited to the contents listed in the table. Tooling Resin states 43%. Resins currently being used by the mold division at plant 3 are considered low shrinkage resins. Testing was conducted by the manufacturer on FCTM 3010 Methods, acceptable under ASTM 2566-6 for Linear Shrinkage molds. Indiana Rule 20-25 states Low Shrinkage resins shall be tested on ASTM D2566-86. We request IDEM's approval of FCTM

3010 Methods for Linear Shrinkage Resin. A copy of FCTM can be faxed upon request. This issue has been discussed with the Indiana Air Pollution Control Board, The facilities air inspector, and Jean Beauchamp.

Response 9:

FCTM-3010 is an internal company procedure from the Freeman Chemical Company (Freeman Chemical Test Method), which establishes the procedure by which shrinkage controlled resins shall be tested using the ASTM D2566-86 methodology. Freeman Chemical is now owned by Cook Composites, the manufacturer of the resin in question.

OAM has reviewed procedure FCTM 3010, as well additional information submitted by the applicant, and determined that it is an acceptable implementation of the ASTM D2566-86 methodology.

Condition D.1.3 has been updated to include low shrinkage resins. The complete revision is shown under the OAQ changes section of this addendum.

Comment 10:

Section D. 1.6 (now D.1.7) Preventative Maintenance Plans

This section purports to require Preventative Maintenance Plans for operations. Under 326 IAC 1-6-3, PMP's are required only for pollution control devices. Normal machinery and equipment and process technologies or methodologies are not normally considered pollution control devices. Clarification of exactly what processes IDEM considers control devices should be in the permit.

Response 10:

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. A Preventive Maintenance Plan is required for any facility with a control device, but is also required for any process where a lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, even if there is no control device. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

As previously stated in Response No. 5, 326 IAC 1-2-3 defines air pollution control equipment as equipment which is not, aside from air pollution control requirements, vital to production of the normal product of the source or to its normal operation. Equipment is vital if the source could not produce its normal product or operate without it.

In the specific case of Global Glass, the dry filters used to control particulate matter from painting and fiberglass operations are considered control devices. For grinding operations, the dry filters or water wash systems are considered control devices regardless of whether the effluent exhausts inside the building or into the atmosphere, because these devices are necessary to ensure compliance with 326 IAC 6-3-2.

The flow chop guns in fiberglass operations are not considered control devices. However, lack of proper maintenance could cause or contribute to a violation of limitations on emissions or potential

to emit. Therefore a Preventive Maintenance Plan is required. In addition, the flow chop guns are subject to PMP because the use of these guns is required as part of the BACT and MACT determinations in Sections D.1.3 and D.2.1. The Unified Emission Factors from the Composites Fabricators Association, which are also a part of the BACT and MACT determinations, and which were used to compute PTE for the source, require non-atomized applicators, which in this application are the flow chop guns.

No change has been made to the permit.

Comment 11:

Section D.1.11 Record Keeping Requirements

Condition (a) (2) require a log of dates used. Dates of use are meaningless when the applicable limit is an annual limit based upon a 12-month rolling average and condition (a) requires records to be maintained monthly. This would be unreasonable and shows no environmental benefit for requiring dates of use, monthly records, quarterly compliance records and annual emission statements to show that the company is in compliance with a 12-month rolling average limitation.

Response 11:

Condition D.1.11 (a)(2) (now D.1.12 (a)(2)) has been revised as follows:

D.1.1**2** ~~1~~ Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.3, and **D.1.5** ~~D.1.4~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Conditions D.1.1, D.1.3 and **D.1.5** ~~D.1.4~~.

(1) The amount, VOC content and volatile organic HAP content of each resin, gel coat and paint. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the **monthly usage of each resin, gelcoat and paint** ~~dates of use~~;

(3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.

(4) The cleanup solvent usage for each month;

(5) The total VOC and volatile organic HAP usage for each month; and

(6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

Comment 12:

Section D.2 Facility Description

The panel operations located at Plant 4 have a panel cutter, which has no direct exhaust. Particulate is collected in a drum collection container. This is not listed in the description. Clarification is requested for record documentation that the equipment is listed as insignificant in this permit.

Response 12:

The panel cutter has been added to the insignificant activities list in the TSD and in the equipment lists Sections A.4 and D.4 of the permit. See response to comments 4 and 20.

No change has been made to the permit.

Comment 13:

Section D.2.1 Emission Limitation & Standards

See comments for D 1.3 above. Also, Construction Permit CP 039-9601-00493 was issued to the source in 1998. It was one of the first in the State to be reviewed under the new MACT/BACT state guidance policies. Global Glass, Inc. has specific equipment which limits the potential for overspray. IDEM officials and the Air Pollution Control Board have visited the facility and deemed this panel process to be a form of controlled spray application. This permit does not state that the reciprocators in connection with the use of vacuum bagging and wood bonding have been approved by IDEM as an optimized spray technique as listed in page 7/10 #5, #7 and #8 of the previously approved BACT/MACT determination.

Response 13:

The applicant is correct that the reciprocator spray guns were approved as a form of controlled spray application in CP 039-9601-00493. The condition stating this approval in CP 039-9601-00493 has been added as Condition D.2.1 (g) of the permit as follows:

(g) The Permittee has demonstrated to the satisfaction of IDEM, OAQ that the following techniques inherent in the design of the flat panel manufacturing operation reduce emissions and can be considered equivalent to meeting the requirements of Conditions D.2.1 (c) and (d) listed above:

(1) Overhead mechanized spray reciprocator to apply all gel coats and resins, which minimizes overspray off the mold through proper placement of spray gun stops and spray gun pressure calibration according to guidelines published by IDEM, OAM. The spray gun type shall be high volume low pressure (HVLP) or the equivalent.

(2) Placement of wood panels and minimal period of roll-out immediately after the last resin application.

Hence, the use of the techniques listed above is hereby approved by IDEM, OAQ as alternatives to meeting the requirements of Conditions D.2.1 (c) and (d) provided the techniques are employed from the startup of operation. All other conditions stated

in this permit remain in effect.

Comment 14:

Section D.2.2 and Section D.1.5 Particulate Matter

This section purports to impose a maximum hourly emission limit and process throughput rate under 326 IAC 6-3. Rule 6-3 cannot be used to establish limits on process throughput.

Response 14:

There is no intent in either Condition D.1.5 (now D.1.6) or Condition D.2.2 (now D.2.3) to place a restriction on process weight. These conditions simply state how to calculate the allowable hourly emission rates under 326 IAC 6-3-2. The equation presented in these conditions is valid for process weights up to 60,000 pounds per hour, but does not limit process weights to 60,000 pounds per hour. This methodology was selected because the Part 70 application materials indicated that process weights at the source were within that range. 326 IAC 6-3-2 contains an alternative calculation methodology for process weights above 60,000 pounds per hour.

No change has been made to the permit.

Comment 15:

Section D 2.3 Preventative Maintenance Plans

See Comment for D.1.6. Preventative Maintenance Plans should only be required on pollution control devices. Clarification and justification for including process operations and equipment is requested.

Response 15:

As previously stated in Response 10, the PMP requirement in 326 IAC 1-6-3 affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

326 IAC 1-2-3 defines air pollution control equipment as equipment which is not, aside from air pollution control requirements, vital to production of the normal product of the source or to its normal operation. Equipment is vital if the source could not produce its normal product or operate without it.

In the specific case of the Global Glass flat panel facility, the air-assisted airless gun in the gel coat reciprocator and the flow chop gun are not considered control devices. However, these guns are subject to PMP because use of these guns is required to realize the lower emission rates inherent in the Unified Emission Factors from the Composites Fabricators Association, which are a part of the MACT determination. The dry filters used to control particulate matter from overspray are considered control devices.

No change has been made to the permit.

Comment 16:

Section D 2.8 Record Keeping Requirements

Same comment as Section D 1.11. Global questions whether it is reasonable to require a log of dates used of VOC/HAP containing materials when already demonstrating monthly compliance on a 12 month rolling year.

Response 16:

Condition D.2.8 (a)(2) (now D.2.9 (a)(2)) has been revised as follows:

D.2.**9** ~~8~~ Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Condition D.2.1.

(1) The amount, VOC content and volatile organic HAP content of each resin and gelcoat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the **monthly usage of each resin and gelcoat** ~~dates of use~~;

(3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.

(4) The cleanup solvent usage for each month;

(5) The total VOC and volatile organic HAP usage for each month; and

(6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

Comment 17:

Section D.3 Facility Description

Item (g) the grinding booth at plant three does not exhaust through a stack. There is no direct exhaust and the water wash system is a closed loop. This operation of a water wash system does not require the use of dry filter media. It appears an error has been made in the description using the SV003 stack for the County Road 3 Plant 4 location.

Item (m) the belt sander and saws are connected to the 3-bag dust collection system. This permit only list the belt sander.

Response 17:

The Section D.3 Facility Description has been revised as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Grinding

Plants 1 and 2 - US 33 West

(d) One (1) metton grinding area, known as MGB, constructed in 1994, with a maximum capacity 200 parts per hour, equipped with ~~dry filters and~~ a water wash system as control equipment. ~~and exhausting inside the building~~.

Plant 3 - Elk Park Drive

(g) One (1) grinding booth, known as Booth C, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, equipped with ~~dry filters and~~ a water wash system as control equipment. ~~and exhausting to stack SV003.~~

Plant 4 - County Road 3

(j) One (1) grinding booth, identified as SV003, constructed in 1998, equipped with an air wall dust collection system exhausting inside the building for air pollution control, capacity: 2,179 pounds per hour.

(m) One (1) 52" wide belt sander, **one (1) table saw and one (1) radial arm saw** for the flat panel operation, constructed in 1998, equipped with a 3-bag dust collection system for particulate control exhausting inside the building, maximum capacity: 250 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 18:

Section D. 3. 1 Particulate Matter

(a), (b), (c) & (d) This purports to impose a maximum hourly emission limit and process throughput rate under 326 IAC 6-3. Rule 6-3 cannot be used to establish limits on process throughput.

Response 18:

See Response 14. No change has been made to the permit.

Comment 19:

Section D. 3.2 Particulate Matter (PM) Compliance requirements

The grinding booth in the Metton operations is currently being revised and updated. It will no longer exhaust to the outside, rather it will have no direct exhaust and be internal with return air into the shop. This system does not require the use of fabric filters. The water acts as a fall and the partic-

ulate matter is pulled up into the waterfall and constantly recycles. Dust particles become saturated and fall to a collection pan. The water wash system at Plant 3 does not exhaust to the outside atmosphere. The effluent exhausts inside the plant and does not require the use of dry filter media.

Response 19:

Condition D.3.2 has been revised as follows:

D.3.2 Particulate Matter (PM)

In order to comply with Condition D.3.1;

(a) The ~~dry filters and~~ water wash system for PM control shall be in operation at all times when the Plants 1 and 2 metton grinding booth, known as MGB, is in operation.

(b) The ~~dry filters and~~ water wash system for PM control shall be in operation at all times when the Plant 3 grinding booth (C) is in operation.

(c) The air wall dust collection system for PM control shall be in operation at all times when the Plant 4 grinding booth (SV003) is in operation.

(d) The 3-bag dust collection system for PM control shall be in operation at all times when the Plant 4 belt sander ~~is~~ **and saws are** in operation.

Comment 20:

D.4 Insignificant Activities

This section should be updated as necessary to be consistent with any changes requested in Section A. Global Glass has verified that the welding equipment is being used at all plant locations. An updated list of welding equipment was submitted prior to public notice of this permit. Additional copies can be requested.

Response 20:

The facilities description in Section D.4 has been revised as follows:

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

~~**Plant 3**~~

~~(a) One (1) metal inert gas welding station, capacity 0.5 pounds of wire per hour. [326 IAC 6-3-2]~~

~~(b) One (1) oxyacetylene flame cutting station, capacity 0.05 inches cut per minute. [326 IAC 6-3-2]~~

(a) Metal inert gas and oxyacetylene flame cutting operations at various locations in the four plants, with emissions less than 5 pounds per day or 1 ton per year of a single HAP, less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, and less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(b) ~~(c)~~ One (1) woodworking area equipped with a **two bag** ~~baghouse~~ dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]

(c) One (1) panel cutter located at Plant 4, equipped with a drum collection system and no direct exhaust, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.

(d) One (1) CNC wood cutting and one (1) CNC metal cutting machine, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.

(e) ~~(d)~~ Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 21:

D.4.1 Particulate Matter (PM)

This purports to impose a maximum hourly emission limit and process throughput rate under 326 IAC 6-3. Rule 6-3 cannot be used to establish limits on process throughput.

Response 21:

See Response 14. No change has been made to the permit.

Comment 22:

D.4.2. VOC Volatile Organic Compounds

What types of cleaners are you considering to add to this condition? Global Glass uses aqueous solutions to soak rollers in, and acetone for other equipment cleaning. Metal containers for acetone resemble those of parts washers however do not contain all the parts washer equipment and

therefore are not true degreasing machines. Acetone is stored in the metal containers for fire protection rather than setting cleaning buckets throughout plant areas. Clarification is requested on this type of cleaning operation to determine if this process falls under the regulation cited.

Response 22:

326 IAC 1-2-18.5 defines a "cold cleaner degreaser" as a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush, flush, or immerse an article for the purpose of cleaning or degreasing the article.

Condition D.4.2 applies to cold cleaners and degreasers using volatile organic solvents. It does not apply to acetone, which is not considered a VOC.

No change has been made to the permit.

Comment 23:

D.4.3 Particulate Matter (PM) Compliance Determination Requirements

Plant 3 woodworking operations utilize a two-bag dust collection system, which is considered closed loop and doesn't exhaust to the outside. In this condition it is referred to as a dust collector…sounds like cyclone or baghouse not internal bag system. Please clarify.

Response 23:

Dust collector in the context of this condition applies to any of the particulate control devices described in the Facilities Description for Section D.4. The fact that the effluent is discharged inside the building or outside the building is not a relevant factor in determining compliance with 326 IAC 6-3-2.

No change has been made to the permit.

Comment 24:

Page 45 of 49 and 46 of 49, Compliance Data Section Reports

The Metton Division operates separately from the fiberglass operations. It is requested for reporting that reports be revised to section out emissions. The metton paint and prime booths have a 25 ton limit, the panel division has an 100 ton limit, and the balance of fiberglass production, mold operations, and metton press operations have a 249 ton limit. Verbal comments were previously submitted to MES.

Response 24:

There appears to some confusion regarding the reporting forms and limits. The Metton Painting Booth and Metton Final Finish Booth have a VOC limit of less than 25 tons per consecutive 12 month period, and a reporting form for this limit on page 46 (now page 53) of the permit. This limit is necessary to make 326 IAC 8-1-6 (BACT) not applicable to these facilities. These same booths are also part of the overall site limit of less than 250 tons per consecutive 12 month period, which has a reporting form on page 45 (now page 48) of the permit. In other words, the emissions from

the Metton Painting Booth and Metton Final Finish Booth should be reported on both forms, and are applicable to both limits. The Plant 4 Flat Panel Manufacturing operation has a limit of less than 100 tons of Volatile Organic HAPs per consecutive 12 month period, that is separate from all other limits.

The Reporting Requirements for Sections D.1 and D.2 state that quarterly reports to document compliance with permit limits shall be submitted using the reporting forms located at the end of the permit, **or their equivalent**, within thirty (30) days after the end of the quarter being reported. The applicant is free to design forms more applicable to their specific application, provided all appropriate information is included.

No change has been made to the permit.

Comment 25:

General Comments

At the bottom of the quarterly emission reports it also states a signed certification needs to accompany each report. Are you now requiring the responsible official to certify monthly and quarterly emission reports? This seems unduly burdensome and duplicative since the certifying individual must sign quarterly compliance monitoring reports, annual compliance certification forms and annual emission statements.

Response 25:

A signed certification must accompany all quarterly emission reports. No change has been made to the permit.

Comment 26:

Corrections to the TSD should be consistent with facility description corrections listed throughout the comments and any changes IDEM incorporates.

Response 26:

All changes to the TSD are made in this TSD addendum, and are consistent with changes made to the Part 70 permit. No change has been made to the permit.

IDEM OAQ Changes

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Changes 1, 2, 3, 4 and 8 have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and became effective on January 19, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the Internet at http://www.state.in.us/idem/air/rules/apcb/packets/index.html. The rule revisions were published in the February 1, 2002 Indiana Register which can be found on the Internet at http://www.IN.gov/legislative/register/index-25.html.

Change 1:

Condition B.2 has had the rule cite 326 IAC 2-1.1-9.5 added to include the new promulgated rule which clarifies when permits expire and when conditions in previous issued permits are superseded as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Change 2:

Condition B.8, Compliance with Permit Conditions, has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) ~~(b)~~ It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) ~~(c)~~ An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Change 3:

Condition B.12 Emergency Provisions (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology-based emission limitations only. The condition is changed as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16~~.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

~~(g) Operations may continue during an emergency only if the following conditions are met:~~

~~(1)~~ If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

Change 4:

Condition B.14 Multiple Exceedances has been deleted because 326 IAC 2-7-5(1)(E) has been repealed since it conflicted with 40 CFR 70.6(a)(6) as follows:

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

Change 5:

Condition B.14 Prior Permits Superseded was added to the proposed permit to implement the intent of the new rule 326 IAC 2-1.1-9.5 as follows:

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

Change 6:

Paragraph (b) of Condition B.13 Permit Shield has been deleted because this paragraph is no longer necessary due to the addition of the new Condition B.14 Prior Permits Superceded as follows. All subsequent B.13 paragraphs have been numbered.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

Change 7:

The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. Condition B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations. The changes are as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its

equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

Change 8:

Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised Condition C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised Condition C.16 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change 9:

The IDEM, OAQ has restructured Condition C.18 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications. The changes are as

C.15 Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, **supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected**

timeframe for taking reasonable response steps.

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows**: ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken**. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities**. ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Change 10:

Condition D.1.1 has been changed to remove the rule cite for BACT (326 IAC 8-1-6). The change is as follows:

D.1.1 Volatile Organic Compounds [326 IAC 2-2] [40 CFR 52.21] ~~[326 IAC 8-1-6]~~

Change 11:

326 IAC 20-25, Emissions From Reinforced Plastics Composites Fabricating Emission Units, became effective on March 7, 2001. Condition D.1.3 has been modified to be consistent with the rule, and Condition D.1.4 has been added, to implement the work practice, cleaning and training requirements of this rule. The revised conditions are as follows. All subsequent D.1 conditions have been renumbered accordingly.

D.1.3 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to the determination of Best Available Control Technology for VOC emissions from resin and gel coat application operations at the Plant 3 gel coat booth (A), Plant 3 lamination booth (B), the Plant 4 custom gel coat (SV001) and the Plant 4 custom lamination booth (SV002), the Permittee shall comply with the following conditions:

(a) Use of **resins and** gel coats ~~and resins that contain styrene~~ shall be limited such that the potential to emit (PTE) VOCs for the entire source (Plants 1, 2, 3 and 4, with the exception of the flat panel facility) shall be less than 250 tons per twelve (12) consecutive month**s** ~~period~~. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, ~~content of~~ **weight percent** monomer that is **VOC** ~~HAP~~, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. ~~Volatile organic HAP~~ **VOC** emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) **Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA approved form**, ~~The~~ emission factors ~~approved for use by IDEM, OAQ~~ shall be taken from the following reference **approved by IDEM OAQ**: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. ~~This reference is included with this permit~~. For ~~HAP-emitting~~ operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, ~~HAP~~ monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

~~(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:~~

~~Type of Gel Coat or Resin~~	~~HAP Monomer Content, % by weight~~
~~Production[1] Gel Coat~~	~~37~~
~~Tooling[2] Gel Coat~~	~~45~~
~~Production Resin~~	~~35~~
~~Tooling Resin~~	~~43~~

~~[1] Production refers to the manufacture of parts.~~
~~[2] Tooling refers to the manufacture of the molds from which parts are manufactured.~~

~~HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis~~.

~~Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:~~

~~(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).~~

~~Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);~~

~~EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.~~

~~Cross averaging between resin categories, e.g., tooling gel coat and production resin, is acceptable~~.

~~(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.~~

~~If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device~~.

~~(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.~~

~~HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system~~.

(b) As a surrogate to volatile organic compounds (VOC) limits, resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	**48***
Production-Noncorrosion Resistant Unfilled	**35***
Production-Noncorrosion Resistant Filled ($35% by weight)	**38**
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	**42**
Production, Class I, Flame and Smoke	**60***
Shrinkage Controlled	**52**
Tooling	**43**
Gel Coat Application	
Production-Pigmented	**37**
Clear Production	**44**
Tooling	**45**
Production-Pigmented, subject to ANSI[a] standards	**45**
Production-Clear, subject to ANSI[a] standards	**50**

[a] American National Standards Institute.

*** Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).**

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.12 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$' Em_A \leq ' (M_R * E_a)$

Where:

M_R = Total monthly mass of material within each category
E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Cross averaging between resin categories has been approved by IDEM OAQ for Global Glass. In these instances, the HAP monomer content limits for resins and gel shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging across categories:

$' Em_A \leq ' (M_R * E_{Ra}) + ' (M_G * E_{Ga})$
Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

Em_A = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

(c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.
(2) Production, specialty product resins from all sources.
(3) Tooling resins used in the manufacture of watercraft.
(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.
(2) Air-assisted airless.
(3) Airless.
(4) High volume, low pressure (HVLP).
(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(e) The work practice, cleaning, and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.1.4 shall be followed.

~~(e) The listed work practices shall be followed~~:

~~(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.~~

~~(2) For VOC- and/or HAP-containing materials~~:

~~(i) Cleanup solvent containers shall be used to transport solvent from drums to work~~.

~~(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.~~

~~(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.~~

~~(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.~~

~~(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

~~(3) All material storage containers shall be kept covered when not in use.~~

D.1.4 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

(a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.
(B) All production and tooling gel coats that contain HAPs.
(C) Waste resins and gel coats that contain HAPs.
(D) Cleaning materials, including waste cleaning materials.
(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(6) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(A) Appropriate application techniques.
(B) Appropriate equipment cleaning procedures.
(C) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(7) The owner or operator shall maintain the following training records on site and available for inspection and review:

(A) A copy of the current training program.
(B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Pursuant to 326 IAC 20-25-3(d), on or after January 1, 2002 the following cleaning operations for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps

and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.
(2) Address of the physical location.
(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

Change 12:

Condition D.1.7 (now D.1.8) has been revised to address both VOCs and HAPs.

~~D.1.7 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC usage limitations contained in Conditions D.1.1, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer~~.

D.1.8 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation in D.1.1 and Compliance with the HAP monomer content and usage limitations in Condition D.1.3 shall be determined by one of the following:

(a) The manufacturer's certified product data sheet.

(b) The manufacturer's material safety data sheet.

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(d) An alternate method approved by IDEM, OAQ.

Change 13:

Condition D.1.9, (now D.1.10) has been revised to reference Condition D.1.6.

D.1.10 Particulate Matter (PM)

In order to comply with Condition **D.1.6** ~~D.1.5~~, the dry filters for PM control shall be in operation at all times when the spray booths, gel coat booths and lamination booths are in operation.

Change 14:

Condition D.1.11 (now D.1.12) has been modified to include recordkeeping for the training requirements of Condition D.1.4(b).

D.1.12 ~~D.1.11~~ Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.3, D.1.4 and **D.1.5**, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Conditions D.1.1, D.1.3 and **D.1.5** ~~D.1.4~~.

(1) The amount, VOC content and volatile organic HAP content of each resin, gel coat and paint. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the **monthly usage of each resin, gelcoat and paint** ~~dates of use~~;

(3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.

(4) The cleanup solvent usage for each month;

(5) The total VOC and volatile organic HAP usage for each month; and

(6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.4(b), the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) ~~(b)~~ To document compliance with Conditions **D.1.10 and D.1.11** ~~D.1.9 and D.1.10~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly

inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) ~~(c)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 15:

326 IAC 20-25, Emissions From Reinforced Plastics Composites Fabricating Emission Units, became effective on March 7, 2001. Condition D.2.1 has been modified to be consistent with the rule, and Condition D.2.2 has been added to implement the work practice and training requirements of this rule. The revised conditions are as follows. All subsequent D.2 conditions have been renumbered accordingly.

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 039-9601-00493 issued on August 31, 1998, and the MACT determination under 326 IAC 2-4.1-1, operating conditions for the gel coat reciprocator flat panel facility, identified as SV004, and the resin reciprocator flat panel facility, identified as SV005, shall be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from ~~use of such~~ resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month**s**. ~~period~~. Compliance with this limitation also makes the requirements 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, ~~content of~~ **weight percent** monomer **content** that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the ~~HAP~~ monomer content, method of application, and other emission reduction techniques ~~used~~ for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) **Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA approved form**, ~~The~~ emission factors ~~approved for use by IDEM, OAQ~~ shall be taken from the following reference **approved by IDEM OAQ**: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. ~~This reference is included with this permit~~. For ~~HAP-emitting~~ operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

~~(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:~~

~~Type of Gel Coat or Resin~~	~~HAP Monomer Content, % by weight~~
~~Production[1] Gel Coat~~	~~37~~
~~Tooling[2] Gel Coat~~	~~45~~
~~Production Resin~~	~~35~~
~~Tooling Resin~~	~~43~~

~~1 Production refers to the manufacture of parts.~~
~~2 Tooling refers to the manufacture of the molds from which parts are manufactured.~~

~~HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.~~

~~Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:~~

~~(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).~~

~~Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);~~

~~EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.~~

~~Cross averaging between resin categories, e.g., tooling gel coat and production resin, is acceptable.~~

~~(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.~~

~~If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are~~

~~not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.~~

~~(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.~~

~~HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

(b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	**48***
Production-Noncorrosion Resistant Unfilled	**35***
Production-Noncorrosion Resistant Filled ($35% by weight)	**38**
Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet	**42**
Production, Class I, Flame and Smoke	**60***
Shrinkage Controlled	**52**
Tooling	**43**
Gel Coat Application	
Production-Pigmented	**37**
Clear Production	**44**
Tooling	**45**
Production-Pigmented, subject to ANSI[a] standards	**45**
Production-Clear, subject to ANSI[a] standards	**50**

[a] American National Standards Institute.

*** Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).**

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and

usage as specified under Condition D.2.9 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$\sum Em_A \leq \sum (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category
E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

(c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.
(2) Production, specialty product resins from all sources.
(3) Tooling resins used in the manufacture of watercraft.
(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.
(2) Air-assisted airless.
(3) Airless.
(4) High volume, low pressure (HVLP).
(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(e) Cleaning operations for resin and gel coat application equipment shall meet the following:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

~~(e) The listed work practices shall be followed:~~

~~(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.~~

~~(2) For VOC- and/or HAP-containing materials:~~

~~(i) Cleanup solvent containers shall be used to transport solvent from drums to work.~~

~~(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.~~

~~(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.~~

~~(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.~~

~~(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

~~(3) All material storage containers shall be kept covered when not in use.~~

(f) The work practice and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.2.2 shall be followed.

(g) The Permittee has demonstrated to the satisfaction of IDEM, OAQ that the following techniques inherent in the design of the flat panel manufacturing operation reduce emissions and can be considered equivalent to meeting the requirements of Conditions D.2.1 (c) and (d) listed above~~:~~

(1) Overhead mechanized spray reciprocator to apply all gel coats and resins, which minimizes overspray off the mold through proper placement of spray gun stops and spray gun pressure calibration according to guidelines published by IDEM, OAM. The spray gun type shall be high volume low pressure (HVLP) or the equivalent.

(2) Placement of wood panels and minimal period of roll-out immediately after the last resin application.

Hence, the use of the techniques listed above is hereby approved by IDEM, OAQ as alternatives to meeting the requirements of Conditions D.2.1 (c) and (d) provided the techniques are employed from the startup of operation. All other conditions stated in this permit remain in effect.

D.2.2 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

(a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.
(B) All production and tooling gel coats that contain HAPs.
(C) Waste resins and gel coats that contain HAPs.
(D) Cleaning materials, including waste cleaning materials.
(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(6) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(A) Appropriate application techniques.
(B) Appropriate equipment cleaning procedures.
(C) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(7) The owner or operator shall maintain the following training records on site and available for inspection and review:

(A) A copy of the current training program.
(B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.
(2) Address of the physical location.
(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

Change 16:

Condition D.2.4 (now D.2.5) has been revised to address both VOCs and HAPs.

~~D.2.4 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer~~.

D.2.5 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content and usage limitations in Condition D.2.1 shall be determined by one of the following:

(1) The manufacturer's certified product data sheet.

(2) The manufacturer's material safety data sheet.

(3) Sampling and analysis, using any of the following test methods, as applicable:

(A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(4) An alternate method approved by IDEM, OAQ.

Change 17:

Condition D.2.8 (now D.2.9) has been modified to include recordkeeping for the training requirements of Condition D.2.2(b).

D.2.9 ~~D.2.8~~ Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Condition D.2.1.

(1) The amount, VOC content and volatile organic HAP content of each resin and gelcoat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the **monthly usage of each resin and gelcoat** ~~dates of use~~;

(3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.

(4) The cleanup solvent usage for each month;

(5) The total VOC and volatile organic HAP usage for each month; and

(6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

(b) To document compliance with Condition D.2.2(b), the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) ~~(b)~~ To document compliance with Condition **D.2.7** ~~D.2.6~~ and **D.2.8** ~~D.2.7~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) ~~(c)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 18:

Condition D.4.2 has been revised to include the requirements of 326 IAC 8-3-2.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5] [326 IAC 8-3-2]

(c) Compliance with 326 IAC 8-3-5 (Cold cleaner degreaser operation and control) also satisfies the requirements of 326 IAC 8-3-2 (Cold cleaner operation).

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Global Glass, Inc.**
Source Location:	**28967 US 33 West, Elkhart, Indiana 46516**
County:	**Elkhart**
SIC Code:	**3089**
Operation Permit No.:	**T 039-7574-00392**
Permit Reviewer:	**Patrick T. Brennan**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Global Glass, Inc. relating to the operation of a fiberglass and plastic parts manufacturing source.

Source Definition

This fiberglass and plastic parts manufacturing company consists of four (4) plants:

(a) Plant 1 is located at 28967 U.S. 33 West, Elkhart, Indiana;

(b) Plant 2 is located at 28967 U.S. 33 West, Elkhart, Indiana;

(c) Plant 3 is located at 56807 Elk Park Drive, Elkhart, Indiana; and

(d) Plant 4 is located at 58190 County Road 3, Elkhart, Indiana.

Since the four (4) plants are located in contiguous properties, have the same SIC codes and owned by one company, they will be considered as one (1) source. This determination was made previously in CP 039-9601-00493.

History

Plants 1 and 2, at 28967 U.S. 33 West, in Elkhart, were originally registered. They were permitted in 1994. Plant 3, at 56807 Elk Park Drive, in Elkhart, was permitted in 1996, and Plant 4, at 58190 County Road 3, in Elkhart, was permitted in 1998. When Plant 4 was constructed, some production facilities from Plant 1 were moved to Plant 4. At that same time, a determination was made that all four plants were considered as one source. The Plant 4 permit contained a 250 ton per year VOC limitation for the existing emissions units at all four plants. The new emissions unit at Plant 4, the flat panel facility, was treated as a minor source modification to an existing minor source. The flat panel facility was also subject to 326 IAC 2-4.1-1 (New Source Toxics Control), and VOC emissions were limited to 100 tons per year as part of the MACT determination. Hence, the source now has allowable VOC emissions of 350 tons per year.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Plants 1 and 2 - US 33 West

(a) One (1) metton injection area, known as MIJB1, constructed in 1994, equipped with four (4) metton injection presses, each with a maximum capacity of 50 parts per hour, emissions are uncontrolled and exhausting to stack SV004.

(b) One (1) metton painting booth, known as MPB, constructed in 1994, equipped with HVLP spray equipment, with a maximum capacity of 200 parts per hour, using dry filters as control equipment, and exhausting to stack SV005.

(c) One (1) metton post final/final finish area, known as MFF, constructed in 1994, equipped with HVLP spray equyipment, with a maximum capacity 200 parts per hour, equipped with dry filters for air pollution control, and exhausting to stack SV007.

(d) One (1) metton grinding area, known as MGB, constructed in 1994, with a maximum capacity 200 parts per hour, equipped with dry filters and a water wash system as control equipment, and exhausting inside the building.

Plant 3 - Elk Park Drive

(e) One (1) gel coat booth, known as Booth B, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV001.

(f) One (1) lamination booth, known as Booth A, constructed in 1996, with a maximum capacity 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV002.

(g) One (1) grinding booth, known as Booth C, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, equipped with dry filters and a water wash system as control equipment, and exhausting to stack SV003.

Plant 4 - County Road 3

(h) One (1) custom gel coat booth, identified as SV001, constructed in 1998, equipped air assisted airless spray equipment and dry filters for overspray control, capacity: 19 fiberglass parts per hour.

(i) One (1) custom lamination booth, identified as SV002, constructed in 1998, equipped with flowchop gun systems and dry filters for overspray control, capacity: 19 fiberglass parts per hour.

(j) One (1) grinding booth, identified as SV003, constructed in 1998, equipped with an air wall dust collection system exhausting inside the building for air pollution control, capacity: 2,179 pounds per hour.

(k) One (1) gel coat reciprocator flat panel facility, identified as SV004, constructed in 1998, equipped with one (1) air- assisted spray gun and dry filters for overspray control, capacity: 5 flat panels per hour.

(l) One (1) resin reciprocator flat panel facility, identified as SV005, constructed in 1998, equipped with one (1) flowchop gun and dry filters for overspray control, capacity: 5 flat panels per hour.

(m) One (1) 52" wide belt sander for the flat panel operation, constructed in 1998, equipped with a 3-bag dust collection system for particulate control exhausting inside the building, maximum capacity: 250 pounds per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(c) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons, and vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(d) Equipment used exclusively for the following: Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(h) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Closed loop heating and cooling systems.

(k) Infrared cure equipment.

(l) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(m) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

(n) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(p) Process vessel degassing and cleaning to prepare for internal repairs.

(q) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(r) Paved and unpaved roads and parking lots with public access.

(s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(u) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(v) On-site fire and emergency response training approved by the department.

(w) Stationary fire pumps.

(x) Purge double block and bleed valves.

(y) Filter or coalescer media changeout.

(z) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38EC).

(aa) Four (4) resin storage tanks emitting less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs.

(bb) Mold maintenance area emitting less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs.

(cc) One (1) metal inert gas welding station, capacity 0.5 pounds of wire per hour.

(dd) One (1) oxyacetylene flame cutting station, capacity 0.05 inches cut per minute.

(ee) One (1) woodworking area equipped with a baghouse dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.

(ff) Two (2) acetone solvent distillation systems, one (1) at Plant 3 and one (1) at Plant 4.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) AA 039-11798-00493 issued on March 16, 2000;

(b) CP 039-9601-00493 issued on August 31, 1998;

(c) A 039-8605-00392 issued on June 13, 1997;

(c) A 039-6426-00392 issued on August 20, 1996;

(d) CP 039-4698-00208 issued on February 21, 1996; and

(e) CP 039-3322-0208, issued on August 24, 1994.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) CP 039-3322-00208, issued on August 24, 1994

Operating Conditions No. 4 and 7: 326 IAC 8-1-6 BACT limit and reporting

Reason not incorporated: The gelcoat and lamination booths at Plants 1 and 2 were moved to Plant 4, and re-permitted under CP 039-9601-00493 issued on August 31, 1998.

(b) CP 039-4698-00208, issued on February 21, 1996

Operating Condition No. 8: 326 IAC 8-1-6 BACT determination

Reason not incorporated: All BACT determinations have been re-evaluated with revised fiberglass reinforced plastics emission factors.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on August 11, 2000.

A notice of completeness letter was mailed to the source on January 22, 1997.

Emission Calculations

See Appendix A, pages 1 and 2 of 2 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA." This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	2,249
PM_{10}	2,249
SO_2	0.043
VOC	1,907
CO	1.73
NO_X	7.27

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Styrene	1,329
Methyl Methacrylate	179
TOTAL	1,508

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM_{10} are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data.

Pollutant	**Actual Emissions** (tons/year)
PM	4.00
PM_{10}	3.99
SO_2	0.0
VOC	40.0
CO	0.0
NO_X	0.0
Dimethyl Phthalate	1.78
MEK	0.17
Styrene	29.5
Toluene	0.032
Xylene	0.090

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Total Source (Plants 1,2,3 and 4) with the exception of the Plant 4 Flat Panel facility	21.4	21.4	0.0	less than 250	0.0	0.0	199
Plant 4 Flat Panel Facility	12.3	12.3	0.0	less than 100	0.0	0.0	92.4
Plant 1 and 2 Metton Paint Booth (MPB)	0.0	0.0	0.0	less than 25	0.0	0.0	0.0
Insignificant Activities	1.00	1.00	0.043	1.00	1.73	7.27	0.50
Total Emissions	34.7	34.7	0.043	less than 350	1.73	7.27	292

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. Because the source has a

degreasing operation that is an insignificant activity, 40 CFR Part 60, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) could be applicable. However, because the degreasing operation uses no halogenated HAP solvents, 40 CFR Part 60, Subpart T, is not applicable.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is considered a major source under 326 IAC 2-2 (Prevention of Significant Deterioration) because it has allowable VOC emissions greater than 250 tons per year. The source has not been subject to review under PSD rules, because it was permitted as two synthetic minor permits.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Best Available Control Technology (BACT) Determinations

All emission units at each of the plants that are involved in either the production or the surface coating of fiberglass reinforced plastics products underwent BACT review at the time of permitting. BACT was determined to be either a VOC emission limitation and/or some restrictions on coating application methods. After the determination was made that all four plants are considered as one source, some production facilities from Plants 1 and 2 were moved to Plants 3 and 4, thus invalidating the previous BACT limits.

As part of the Part 70 permit review process, all BACT determinations have been revisited to incorporate revised emissions estimates based upon the Composite Fabricators Association (CFA) emission factors, as well as the revised source layout. Each of these BACT determinations for reinforced plastics manufacturing facilities consists of restrictions on allowable styrene content in the various resin types, certain workplace practices, and a VOC emission limitation for that facility. The sum total of these individual facility emission limitations would exceed the 250 ton per year source wide VOC limitation already in place for all production except the flat panel facility. Therefore, OAQ has determined that BACT for these facilities can be accomplished within the overall 250 ton per year VOC limitation, and individual VOC limits are not required for each facility. Work place

practices and styrene content will be specific to each facility.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

(a) All facilities at Plants 1 and 2, the metton injection presses, the metton painting booth, and the metton final finish area, were permitted under CP 039-3322-0208, issued on August 24, 1994. Because this permit was issued prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.

(b) The gel coat and lamination booths at Plant 3 were permitted under CP 039-4698-00208 issued on February 21, 1996. Because this permit was issued prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.

(b) The gel coat and lamination booths at Plant 4 were originally permitted at Plant 1 under CP 039-3322-0208, issued on August 24, 1994, and were moved to Plant 4 in 1998. Because the four plants were consider to be one source, this move was not considered new construction, and it was determined at that time that because these facilities were originally permitted prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Plant 4 Flat Panel Facility

The flat panel facility at Plant 4 was permitted under CP 039-9601-00493 issued on August 31, 1998. Because this permit was issued after July 27, 1997,and because the facility has a potential to emit greater than 10 tons per year of any single HAP and 25 tons per year of any combination of HAPs, it was determined at that time that the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) did apply. A MACT determination was made for this these facilities and the appropriate conditions were included in the permit.

Because the original MACT language in CP 039-9601-00493 included a phase-in period for the use of flow coaters, which has since passed, and because IDEM OAQ has made subsequent refinements to the MACT determination for fiberglass reinforced plastics manufacturing operations that are subject to 326 IAC 2-4.1-1 (New Source Toxics Control), the MACT determination for the flat panel gel coat and resin reciprocator facilities has been revised. In addition, the applicant has requested to be allowed to cross average between resin categories, for example using a low styrene content production resin to offset a higher styrene content tooling resin, which requires prior OAQ approval. The revised conditions are as follows:

Operating conditions for the fiberglass flat panel manufacturing operation shall be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only shall be less than 100 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction

techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	45
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) -(Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) *
EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

The applicant has stated its intention to cross average between resin categories, if necessary, to meet the overall HAP monomer limits.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(3) All material storage containers shall be kept covered when not in use.

326 IAC 6-3-2 (Process Operations)

Plants 1 and 2

(a) The particulate matter (PM) emissions from the metton paint booth (MPB) and the metton post/final finish area (MFF) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

Compliance will be demonstrated by operating the dry filters at all times when these booths are in operation.

(b) The particulate matter (PM) emissions from the metton grinding booth will be limited to 7.59 pounds per hour when operating at a process weight rate 5,014 pounds per hour. Since potential PM emissions after control by the dry filters and water wash system are 0.29 pounds per hour, the grinding operations will comply with this rule.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

$E = 4.10 (2.51 \text{ tons/hr})^{0.67} = 7.59$ pounds per hour.

Compliance will be demonstrated by operating the dry filters and water wash system at all times when the grinding is taking place.

Plant 3

(c) The particulate matter (PM) emissions from the Plant 3 gel coat booth (A) and the lamination booth (B) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

Compliance will be demonstrated by operating the dry filters at all times when these booths are in operation.

(d) The particulate matter (PM) emissions from the Plant 3 grinding booth (C) will be limited to 2.17 pounds per hour when operating at a process weight rate 777 pounds per hour. Since potential PM emissions after control by the dry filters and water wash system are 0.10 pounds per hour, the grinding operations will comply with this rule.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

$E = 4.10 (0.389 \text{ tons/hr})^{0.67} = 2.17$ pounds per hour.

Compliance will be demonstrated by operating the dry filters and water wash system at all times when the grinding is taking place.

Plant 4

(e) The particulate matter (PM) emissions from the custom gel coat booth (SV001), the custom lamination booth (SV002), the gel coat reciprocator flat panel facility (SV004) and the resin reciprocator flat panel facility (SV005), shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

Compliance will be demonstrated by operating the dry filters at all times when these booths are in operation.

(f) The particulate matter (PM) emissions from the Plant 4 grinding booth (SV003) will be limited to 4.34 pounds per hour when operating at a process weight rate 2,179 pounds per hour. Since potential PM emissions after control by the air wall dust collection system are 0.156 pounds per hour, the grinding operations will comply with this rule.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

$E = 4.10 (1.09 \text{ tons/hr})^{0.67} = 4.34$ pounds per hour.

Compliance will be demonstrated by operating the air wall dust collection system at all times when the grinding is taking place.

(g) The particulate matter (PM) emissions from the Plant 4 belt sander will be limited to 1.02 pounds per hour when operating at a process weight rate 250 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

$E = 4.10 (0.125 \text{ tons/hr})^{0.67} = 1.02$ pounds per hour.

Compliance will be demonstrated by operating the 3-bag dust collection system at all times when the belt sander is in operation.

326 IAC 8-1-6 (New facilities; General reduction requirements)

Plants 1 and 2

(a) The metton painting booth (MPB) at Plants 1 and 2 was part of a BACT determination under CP 039-3322-0208, issued on August 24, 1994. That determination is no longer valid because it consisted of a VOC limitation of 5.42 tons per month, which also included VOC emissions from the custom gel coat and lamination booths, which were subsequently moved to Plant 4. Because the metton painting booth (MPB) alone has VOC emissions greater than 25 tons per year, applies coatings to plastic substrates, commenced operation after January 1, 1980, and is governed by no other provisions of Article 8, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) may be applicable. However, because VOC emissions from this facility will be limited to less than 25 tons per year, 326 IAC 8-1-6 is not applicable.

(b) The metton injection area (MJB1) was permitted under CP 039-3322-0208, issued on August 24, 1994. Because potential emissions from this facility are greater than 25 tons per year, and no other 326 IAC rule applies, 326 IAC 8-1-6 (New facilities; General reduction requirements) is applicable. At the time of CP 039-3322-0208, the injection molding process itself, with a 1% emission factor, was considered BACT. This process, to produce running boards, was proposed in place of a traditional open molding process. Subsequently, under CP 039-9601-00493 issued on August 31, 1998, this facility was placed under a source wide VOC limit of less than 249 pounds per consecutive 12 month period. This limit covers all facilities at Plants 1, 2, 3 and 4 except the flat panel facility at Plant 4.

326 IAC 8-1-6 (New facilities; General reduction requirements)

Plant 3

The gel coat and laminating processes (booths A and B) at Plant 3 are subject to 326 IAC 8-1-6 because the VOC potential emissions are greater than 25 tons per year, the facilities commenced operation after January 1, 1980, and they are governed by no other provisions of Article 8. Pursuant to this rule, a Best Available Control Technology (BACT) Analysis is required. BACT for this facility was previously determined in CP 039-4698-00208 issued on February 21, 1996. This determination has been revised in light of new emission factors developed by the Composite Fabricators Association (CFA). In addition, the applicant has requested to be allowed to cross average between resin categories, for example using a low styrene content production resin to offset a higher styrene content tooling resin, which requires prior OAQ approval.

Pursuant to the determination of Best Available Control Technology for VOC emissions gel coat and laminating processes (booths A and B) at Plant 3, the Permittee shall comply with the following conditions:

(a) Use of gel coats and resins that contain styrene shall be limited such that the potential to emit (PTE) VOCs for the entire source (Plants 1, 2, 3 and 4, with the exception of the flat panel facility) shall be less than 250 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel

coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	45
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) -(Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

The applicant has stated its intention to cross average between resin categories, if necessary, to meet the overall HAP monomer limits.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(3) All material storage containers shall be kept covered when not in use.

326 IAC 8-1-6 (New facilities; General reduction requirements)

Plant 4 - Custom Gel Coat and Lamination Booths

The custom gel coat and lamination booths at Plant 4, identified as SV001 and SV002, were originally permitted at Plant 1 under CP 039-3322-0208, issued on August 24, 1994, and were moved to Plant 4 in 1998. At that time, BACT was determined to be a VOC limitation of 5.42 tons per month,

which also included VOC emissions from the metton painting booth (MPB) which remains at Plant 1. Because the custom gel coat and lamination booths alone have VOC emissions greater than 25 tons per year, apply coatings to plastic substrates, commenced operation after January 1, 1980, and are governed by no other provisions of Article 8, the requirements of 326 IAC 8-1-6 (New facilities; General reduction requirements) are applicable.

Potential VOC emissions from these booths have been revised in light of new emission factors developed by the Composite Fabricators Association (CFA). In addition, the applicant has requested to be allowed to cross average between resin categories, for example using a low styrene content production resin to offset a higher styrene content tooling resin, which requires prior OAQ approval.

Pursuant to the determination of Best Available Control Technology for VOC emissions from the custom gel coat and lamination booths at Plant 4, the Permittee shall comply with the following conditions:

(a) Use of gel coats and resins that contain styrene shall be limited such that the potential to emit (PTE) VOCs for the entire source (Plants 1, 2, 3 and 4, with the exception of the flat panel facility) shall be less than 250 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	45
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) -(Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

The applicant has stated its intention to cross average between resin categories, if necessary, to meet the overall HAP monomer limits.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(3) All material storage containers shall be kept covered when not in use.

326 IAC 8-1-6 (New facilities; General reduction requirements)

Plant 4 - Flat Panel Facility

The flat panel facility at Plant 4 is subject to 326 IAC 8-1-6 because the VOC potential emissions are greater than 25 tons per year, the facility commenced operation after January 1, 1980 and is governed by no other provisions of Article 8. Pursuant to this rule, a Best Available Control Technology (BACT) Analysis is required. Since 326 IAC 2-4.1-1 (New Source Toxics Control) is the most stringent authority for controlling VOC/HAPs emissions, the MACT determined under 326 IAC 2-4.1-1 shall be the BACT and shall satisfy the requirements of 326 IAC 8-1-6 (BACT).

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) emissions welding and flame cutting operations will be limited to 0.674 pounds per hour when operating at a process weight rate 135 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

$E = 4.10\ (0.068\ \text{tons/hr})^{0.67} = 0.674$ pounds per hour.

(b) The particulate matter (PM) emissions from the woodworking operations will be limited to 1.44 pounds per hour when operating at a process weight rate 420 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

$E = 4.10 (0.210 \text{ tons/hr})^{0.67} = 1.44$ pounds per hour.

Compliance will be demonstrated by operating the dust collector at all times when wood-working operations are taking place.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

Testing is not required at this source because emissions estimates are based upon the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, and applicant supplied Material Safety Data Sheets (MSDS).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The dry filters for PM control shall be in operation at all times when the surface coating booths, gel coat booths and lamination booths are in operation.

(b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters at the metton painting booth (MPB), the metton post final/final finish booth (MFF), gel coat booths B and SV001, lamination booths A and SV002, gel coat reciprocator booth SV004, and resin reciprocator booth SV005. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stacks at the metton painting booth (MPB), the metton post final/final finish booth (MFF), gel coat booths B and SV001, lamination booths A and SV002, gel coat reciprocator booth SV004, and resin reciprocator booth SV005, and the presence of overspray on the rooftops and the

nearby ground, weather permitting. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters for the surface coating and fiberglass operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-2 (PSD).

Conclusion

The operation of this fiberglass and plastic parts manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 039-7574-00392.**

Appendix A: Federal Potential Emissions Calculations
VOC, HAP and Particulate
From Surface Coating Operations

Company Name: Global Glass , Inc.
Address City IN Zip: 28967 US 33 West, Elkhart, Indiana 46516
Title V: 039-7574
Plt ID: 039-00392
Reviewer: Patrick Brennan/MES
Date: December 13, 1996

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	Transfer Efficiency
Plants 1 and 2																
Injection Molding																
Metton injection process, Part A, SV04	8.14	90.00%	0.00%	90.00%	0.00%	unknown	1.540	200.00	0.01	7.33	7.33	22.56	541.54	98.83	0.00	100%
Metton injection process, Part B, SV04	8.14	90.00%	0.00%	90.00%	0.00%	unknown	1.540	200.00	0.01	7.33	7.33	22.56	541.54	98.83	0.00	100%
Total														**197.66**		
Primer Paints																
URO-Primer SV27	11.12	29.90%	0.00%	29.90%	0.00%	70.10%	0.0200	200.00	1.00	3.32	3.32	13.30	319.19	58.25	34.14	75%
URO-Primer SV31 (touch up)	11.12	29.90%	0.00%	29.90%	0.00%	70.10%	0.0075	100.00	1.00	3.32	3.32	2.49	59.85	10.92	6.40	75%
URO-Primer SV32 (touch up)	11.12	29.90%	0.00%	29.90%	0.00%	70.10%	0.0075	100.00	1.00	3.32	3.32	2.49	59.85	10.92	6.40	75%
Total														**80.10**		
Plant 3																
Custom Parts (Worst Case Part)																
Yellow Gel Coat, Styrene, SV01	9.91	33.41%	0.00%	33.41%	0.00%	unknown	5.970	6.25	0.4530	3.31	3.31	55.96	1343.12	245.12	269.62	75%
Yellow Gel Coat, MMA, SV01	9.91	4.11%	0.00%	4.11%	0.00%	unknown	5.970	6.25	0.7500	0.41	0.41	11.38	273.22	49.86		75%
Prod. Resin, Styrene (flow coat) SV01	8.95	32.68%	0.00%	32.68%	0.00%	unknown	9.970	6.25	0.11	2.92	2.92	19.32	463.66	84.62	164.44	90%
S-0280 Super Flush	8.86	100.00%	0.00%	100.00%	0.00%	unknown	0.020	6.25	1.00	8.86	8.86	1.11	26.58	4.85	0.00	100%
Super Blue Resin Cleaner	8.76	100.00%	0.00%	100.00%	0.00%	unknown	0.020	6.25	1.00	8.76	8.76	1.10	26.28	4.80	0.00	100%
Total														**389.25**		
Mold Production																
Tooling Gel - Styrene	9.54	38.97%	0.00%	38.97%	0.00%	unknown	5.300	1.0000	0.5360	3.72	3.72	10.56	253.47	46.26	33.79	75%
Tooling Gel - MMA	9.54	3.00%	0.00%	3.00%	0.00%	unknown	5.300	1.0000	0.7500	0.29	0.29	1.14	27.30	4.98		75%
Tooling Resin - Styrene	8.95	46.99%	0.00%	46.99%	0.00%	unknown	0.500	1.0000	0.1220	4.21	4.21	0.26	6.16	1.12	1.04	90%
Filled Tooling Resin - Styrene	5.06	36.50%	0.00%	36.50%	0.00%	unknown	14.300	1.0000	0.1120	1.85	1.85	2.96	70.99	12.96	20.12	90%
Filled tooling Resin - MMA	5.06	2.96%	0.00%	2.96%	0.00%	unknown	14.300	1.0000	0.7500	0.15	0.15	1.61	38.55	7.04		90%
S-0280 Super Flush	8.86	100.00%	0.00%	100.00%	0.00%	unknown	0.020	1.0000	1.0000	8.86	8.86	0.18	4.25	0.78	0.00	100%
Super Blue Resin Cleaner	8.76	100.00%	0.00%	100.00%	0.00%	unknown	0.020	1.0000	1.0000	8.76	8.76	0.18	4.20	0.77	0.00	100%
Total														**73.90**		
Pattern Production																
Tooling Gel - Styrene	9.54	38.97%	0.00%	38.97%	0.00%	unknown	5.300	0.0625	0.5360	3.72	3.72	0.66	15.84	2.89	2.11	75%
Tooling Gel - MMA	9.54	3.00%	0.00%	3.00%	0.00%	unknown	5.300	0.0625	0.7500	0.29	0.29	0.07	1.71	0.31		75%
Tooling Resin - Styrene	8.95	46.99%	0.00%	46.99%	0.00%	unknown	0.500	0.0625	0.1220	4.21	4.21	0.02	0.38	0.07	0.06	90%
Filled Tooling Resin - Styrene	5.06	36.50%	0.00%	36.50%	0.00%	unknown	14.300	0.0625	0.1120	1.85	1.85	0.18	4.44	0.81	1.26	90%
Filled tooling Resin - MMA	5.06	2.96%	0.00%	2.96%	0.00%	unknown	14.300	0.0625	0.7500	0.15	0.15	0.10	2.41	0.44		90%
S-0280 Super Flush	8.86	100.00%	0.00%	100.00%	0.00%	unknown	0.020	0.0625	1.0000	8.86	8.86	0.01	0.27	0.05	0.00	100%
Super Blue Resin Cleaner	8.76	100.00%	0.00%	100.00%	0.00%	unknown	0.020	0.0625	1.0000	8.76	8.76	0.01	0.26	0.05	0.00	100%
Total														**4.62**		

Appendix A: Federal Potential Emissions Calculations
VOC, HAP and Particulate
From Surface Coating Operations

Company Name: Global Glass , Inc.
Address City IN Zip: 28967 US 33 West, Elkhart, Indiana 46516
Title V: 039-7574
Plt ID: 039-00392
Reviewer: Patrick Brennan/MES
Date: December 13, 1996

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	Transfer Efficiency
Plant 4																
Custom Parts (Worst Case Part)																
Yellow Gel Coat, Styrene, SV01	9.91	33.41%	0.00%	33.41%	0.00%	unknown	3.000	19.00	0.4530	3.31	3.31	85.49	2051.80	374.45	411.88	75%
Yellow Gel Coat, MMA, SV01	9.91	4.11%	0.00%	4.11%	0.00%	unknown	3.000	19.00	0.7500	0.41	0.41	17.39	417.38	76.17		75%
Prod. Resin, Styrene (flow coat) SV01	8.95	32.68%	0.00%	32.68%	0.00%	unknown	9.500	19.00	0.11	2.92	2.92	55.96	1343.07	245.11	476.34	90%
Catalyst (SV001/SV002)	9.04	100.00%	1.50%	98.50%	1.50%	unknown	0.010	19.00	1.00	9.04	8.90	1.69	40.60	7.41	0.00	90%
Acetone Cleaner	6.61	100.00%	100.00%	0.00%	100.00%	unknown	0.150	19.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	90%
Pure Lacquer Primer	7.01	100.00%	40.00%	60.00%	40.00%	unknown	0.004	19.00	1.00	7.01	4.21	0.32	7.67	1.40	0.00	100%
Mold Release	7.27	98.00%	0.00%	98.00%	0.00%	unknown	0.001	19.00	1.00	7.12	7.12	0.14	3.25	0.59	0.00	90%
Total														**705.14**		
Flat Panel Facility																
Gel Coat Recipricator, Styrene, SV004	11.17	30.50%	0.00%	30.50%	0.00%	unknown	5.200	5.00	0.45	3.41	3.41	39.42	946.01	172.65	221.02	75%
Gel Coat Recipricator, MMA, SV04	11.17	4.28%	0.00%	4.28%	0.00%	unknown	5.200	5.00	0.75	0.48	0.48	9.25	221.99	40.51		75%
Resin Recipricator, Styrene, SV005	8.89	35.14%	0.00%	35.14%	0.00%	unknown	19.000	5.00	0.11	3.12	3.12	32.64	783.40	142.97	599.85	75%
Catalyst (SV004/SV005)	9.04	100.00%	1.50%	98.50%	1.50%	unknown	0.030	5.00	1.00	9.04	8.90	1.34	32.06	5.85	0.00	75%
Acetone Cleaner	6.61	100.00%	100.00%	0.00%	100.00%	unknown	0.150	5.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Mold Release	7.27	98.00%	0.00%	98.00%	0.00%	unknown	0.150	5.00	1.00	7.12	7.12	5.34	128.24	23.40	0.12	75%
Total														**385.38**		
											Total:	**419.2**	**10060.5**	**1836.0**	**2248.6**	

Control Efficiency		Controlled	Controlled	Controlled	Controlled
VOC	PM	VOC pounds	VOC pounds	VOC	Particulate
	0.985	per hour	per day	tons/yr	tons/yr
Controlled Emissions due to Surface Coating Operations and Controls	**TOTAL:**	**419.2**	**10060.5**	**1836.0**	**33.73**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
Total = Worst Coating + Sum of all solvents used
Flashoff factors for gel coat and resin = CFA Factor (lbs/ton)/(2000 * weight fraction monomer)